**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**
REGION 1
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

# Clean Air Act Inspection Report

**Drafted:** September 13, 2022
**Finalized:** September 21, 2022

**EPA Inspector:** Hannah Patel, Environmental Scientist, Air Compliance Section /HHP/

**EPA Reviewer:** Darren Fortescue, Senior Enforcement Coordinator, Air Compliance Section /DEF/

**Date of Inspection:** August 2, 2022

**Facility Name:** Buckeye Terminals LP

**ICISAir ID#:** CT0000000900900020

**Facility Location:** 280 Waterfront Street, New Haven, CT 06512

**Mailing Address:** Same as above

**Disclaimer:**

Unless otherwise noted, this report describes conditions at the facility/property as observed by EPA inspector(s), and/or through records provided to and/or information reported to EPA inspector(s) by facility representatives and as understood by the inspector(s). This report may not capture all operations or activities ongoing at the time of the inspection. This report does not make final determinations on potential areas of concern. Nothing in this report affects EPA's authorities under federal statutes and regulations to pursue further investigation or action.

**Inspection Attendees:**

| Name | Title | Organization |
|---|---|---|
| Hannah Patel | Environmental Scientist | EPA, Region 1 |
| Davianna Vasconcelos | Environmental Engineer | EPA, Region 1 |
| Nicholas Bobbs | Environmental Engineer | EPA, AED |
| Mark Potash | Engineer | CT DEEP |
| Gina StaplesLassiter | Assistant Operations Manager | Buckeye Terminals |
| Greg Gardner | Terminal Specialist | Buckeye Terminals |

**Facility/Process Description:**

The facility located at 280 Waterfront Street, New Haven CT 06512 , New Haven, Connecticut was purchased by Buckeye Terminals LP ("Buckeye") from Magellan Petroleum in April of 2020. Buckeye had been a publicly held company; however, it was purchased by IFM Investors in 2019. Buckeye has purchased approximately 150 gasoline storage terminals since 2000.

The facility receives petroleum products, including regular gasoline and premium gasoline, from barges and stores the products in 9 storage tanks, 2 of which are designed for Ethanol. The facility distributes the products by loading them onto trucks via a loading rack. The facility does not load any petroleum products onto barges.

**Number of Employees and Working Hours:**

Buckeye employs 31 employees at the 2 gasoline storage facilities and 2 oil storage facilities Buckeye operates in the New Haven area (gasoline facility addresses: 134 Forbes Avenue, New Haven, CT and 280 Waterfront Street, New Haven, CT; Oil Facility Addresses: Unknown).

The facility located at 280 Waterfront Street operates 24 hours a day, 7 days a week, 52 weeks a year.

**Potentially Applicable Clean Air Act Requirements:**

- 40 CFR Part 60 Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels
- 40 CFR Part 60 Subpart XX - Standards of Performance for Bulk Gasoline Terminals
- 40 CFR Part 63 Subpart R - National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)
- Title V Operating Permit Number 117-0262-TV

**Previous Enforcement Actions:**

A "Detailed Facility Report" from EPA's Enforcement and Compliance History Online database indicates that there has been one reported violation on 06/03/2021 by the State of Connecticut. This violation was related to Volatile Organic Compounds (VOCS).

**Opening Conference:**

On August 21, 2022, at 8:00 am, EPA personnel Hannah Patel, Davianna Vasconcelos, and Nicholas Bobbs met CT DEEP personnel Mark Potash. The group proceeded to the facility located at 280 Waterfront Street, New Haven Connecticut and met Gina StaplesLassiter and

Greg Gardner of Buckeye. The group entered the facility and Mr. Bobbs presented his credentials.

Mr. Bobbs said the purpose of the inspection was to conduct forward looking infrared ("FLIR") monitoring of the gasoline storage tanks located at the facility, and to monitor the percent of the lower explosive limit ("%LEL") of the headspace above the internal floating roofs ("IFR"s) of the gasoline storage tanks. Mr. Bobbs then requested a list of tanks containing gasoline and ethanol on site.

**Facility Tour:**

Mr. Gardner and Ms. StaplesLassiter led Mr. Bobbs, Ms. Patel, Ms. Vasconcelos, and Mr. Potash on a tour of the facility.

Mr. Potash conducted the FLIR monitoring using a FLIR camera to survey tank vents for emissions and recorded FLIR video when appropriate.

Inspection personnel conducted %LEL monitoring of the headspace of the IFRs on 6 gasoline storage tanks and 1 ethanol tank: Tank 201, Tank 206, Tank 209, Tank 210, Tank 212M, Tank 214M, and Tank 215. Mr. Bobbs operated a QRAE 3 %LEL Monitor with a 25-foot teflon sample line to conduct the monitoring. Ms. Patel recorded monitoring information on datasheets. Ms. Patel documented the following tank information:

| Tank Number | Product | In Tank | Barrells/Foot |
|---|---|---|---|
| 201 | Ethanol | 10,905 | 1,133 |
| 206 | Regular gasoline | 10,735 | 504 |
| 210 | Premium gasoline | 7,159 | 318 |
| 212 | Regular gasoline | 30,678 | 1,996 |
| 214 | Regular gasoline | 39,803 | 2,013 |
| 215 | Regular gasoline | 61,433 | 2,012 |

Final %LEL monitoring data was not available at the time of writing this inspection report.

**Records Reviewed:**

During the opening conference, Ms. StaplesLassiter provided inspecting personnel with a printed spreadsheet of tank inventory including both the Waterfront St facility and the Forbes Ave facility. Ms. StaplesLassiter explained that 'PBOB' is premium gasoline and 'RBOB' is regular gasoline.

**Closing Conference:**

Inspection personnel left the facility at 12:30PM.

This inspection was performed on the same day as an inspection performed at the Buckeye facility located at 134 Forbes Avenue, New Haven, Connecticut. The closing conference for this inspection was conducted at the 134 Forbs Avenue facility later in the day.

Ms. StaplesLassiter said she did not know the facility's NAICS code and would provide it in a follow up email.

Ms. StaplesLassiter said that every month facility personnel complete %LEL monitoring of the pipes and valves around the facility; however, they do not conduct %LEL monitoring of the headspace above the IFRs of the gasoline storage tanks. Ms. StaplesLassiter confirmed that the tank information, including construction date and emission control equipment listed in the permit, is correct. Ms. StaplesLassiter said the facility uses a vapor combustor system with a vacuum for controlling loading racks emissions. Ms. StaplesLassiter said the facility has not had any excess emission events in the last 12 months.

Ms. StaplesLassiter said maintenance, repair, and inspection records are kept in a system called "BEST" that was developed by the Tank Integrity Group. Ms. StaplesLassiter explained that loads of petroleum products coming in and out of the tanks are kept in the vessel and the shipping records.

Ms. StaplesLassiter said that the temperature of petroleum products stored in tanks is not constantly monitored in each tank. Ms. StaplesLassiter said that the temperature of the petroleum products is hand-measured at least every four days or if a bulk petroleum product movement occurs. Ms. StaplesLassiter said that the product temperature is measured at the loading rack.

Ms. StaplesLassiter agreed to provide the following in a follow-up email:

- The NAICS code for the facility;
- The most recent hatch inspection for the tanks monitored during the inspection;
- The date of most recent out of service inspection for the tanks monitored during the inspection;
- The date of most recent landing of roof for the tanks monitored during the inspection;
- The most recent recorded temperature and date of measurement of the petroleum products for the tanks monitored during the inspection; and
- An Electronic spreadsheet detailing tank inventory for Forbes Ave and Waterfront St facilities (a physical copy had been provided to inspection personnel during opening conference).

Ms. Vasconcelos explained that an inspection report will be written and shared with facility personnel. Ms. Vasconcelos said that if any of the information supplied during the inspection is considered confidential business information, then the facility should let EPA know.